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PROGRAM NARRATIVE STATEMENT

NORTH BRONSON INDUSTRIAL AREA - BRANCH COUNTY, MICHIGAN

EPA Region 5 Records Ctr.



274115

BACKGROUND:

The North Bronson Industrial Area Superfund site is located in southern Michigan adjacent to the city of Bronson in Branch County. The predominant features of the site are the two sets of lagoons located in the northwest (west lagoons) and northeast (east lagoons) sections of the site, south of and adjacent to county drain #30 (CD #30). Several industries at various times and under various names discharged plating and other industrial wastes to these lagoons from the late 1930s until 1981. The lagoons were owned and operated by the city of Bronson and Bronson Plating.

The inactive sludge lagoons contain an estimated 3,000 to 5,000 cubic yards of metal hydroxide sludges. On-site groundwater monitoring wells have shown detectable levels of chlorinated hydrocarbons as well as heavy metals and cyanide. CD #30 sediments are contaminated with heavy metals, cyanide and polychlorinated biphenyls (PCBs). A majority of the people of the city of Bronson live within a 1-mile radius of the site.

ACTIONS TO DATE:

In June 1984, North Bronson received a Hazard Ranking System (HRS) score from the EPA. In June 1986, because of the HRS score, the site was included on the National Priorities List for Remedial Investigation/Feasibility Study (RI/FS) and potential remediation under the Comprehensive Environmental Response Compensation and Liability Act. The site also received a Michigan Site Assessment System Score of 38 (on a scale of 1 to 48) and, consequently, appears on the state Act 307 List.

The MDNR completed the RI/FS in 1993. Field activities were completed in two phases. Phase I field activities began in fall 1988. Phase I activities included sampling of existing wells, well installation, surface water and sediment sampling, waste characterization, a geophysical survey and an industrial survey. Following Phase I field activities, a three-volume Technical Memo was published in October 1989.

Phase II activities were developed after Phase I and approved in 1991. Phase II field activities were completed during the period October through December 1991. These activities included well installation, waste characterization, CD #30 sampling and groundwater and surface and background sampling. The MDNR completed the RI report in July 1993 and the draft Alternatives Array (AA) document a year later. Based on the draft AA, the final FS was completed on April 14, 1995, and forwarded to the EPA for approval.

The Proposed Plan for the site is scheduled for completion in August 1995. The draft Record of Decision is to be completed by November 1995 and finalized by December 1995.

NORTH BRONSON INDUSTRIAL (continued)

SCOPE OF WORK:

The MDNR will provide support assistance to the EPA during all pre-enforcement activities associated with the North Bronson Superfund site. The MDNR will review various documents and provide the EPA with technical assistance during negotiations and attend Potentially Responsible Party negotiations sessions as needed. To complete these activities, the MDNR is requesting \$25,000.

APPLICATION FOR FEDERAL ASSISTANCE
TASK BUDGET
FY95 Q3

V995260-01
NORTH BRONSON INDUSTRIAL
PRE-ENFORCEMENT (B)

TASK DESCRIPTION

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A.02	Review and comment on reports and documents
C.04	Technical assistance during negotiations with PRPs
C.05	Propose language to be included in Consent Decrees
C.06	Review & comment on Consent Decrees
C.09	Liaison between EPA and state programs
D.02	Preparation of quarterly progress reports
D.03	Preparation of CA and MSCA applications

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CURRENT APPROVED BUDGET	\$ 0.00
CHANGE REQUESTED	\$25,000.00

BUDGET TOTAL	\$25,000.00
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PROGRAM NARRATIVE

NORTH BRONSON INDUSTRIAL AREA – BRANCH COUNTY, MICHIGAN

BACKGROUND:

A Record of Decision (ROD) setting forth requirements for implementation of a remedial action (RA) at the North Bronson Industrial Area Superfund site was signed by the MDEQ on May 28, 1998 and by the U.S. EPA on June 19, 1998. Subsequent to this signing, the U.S. EPA, with assistance from the MDEQ, successfully negotiated with the PRPS for implementation of the selected remedy and a Consent Decree (CD) was signed by the parties on March 15, 1999.

The ROD addresses Operable Unit #1 (OU #1) at the North Bronson site. OU #1 is an interim action that addresses the eastern and western sludge lagoons, groundwater impacted by the sludge lagoons, exposure to area-wide groundwater contamination, and County Drain #30.

ACTIONS TO DATE:

The U.S. EPA and the MDEQ developed a statement of work (SOW) for the remedial design (RD) and RA at the site. The SOW was incorporated into the CD.

STATEMENT OF WORK

The CD is expected to be entered into the federal courts by the Department of Justice in late 1999 or early 2000. In accordance with the schedule set forth in the CD, thirty days thereafter, the PRP's must submit a draft work plan describing in detail how they will proceed to implement the RD of the remedy and a schedule for implementation.

The MDEQ requests funding to support the U.S. EPA by conducting reviews of all documents submitted by the PRPs and providing comments on the contents. The MDEQ will attend technical meetings necessary to complete the work plan process.

Upon completion of the work plan, the MDEQ will provide assistance in oversight of on-site activities. These activities may include water, soil, sludge, and sediment sampling activities as well as other pre-design activities.

The MDEQ will respond to inquiries and continue to maintain and update the site mailing list. The MDEQ may provide assistance in obtaining site access. Some of the funds will be used for preparation of progress reports, cooperative agreement (CA) or MSCA applications, as well as for management and maintenance of site files and preparation of state applicable or relevant and appropriate requirements (ARARs).

NORTH BRONSON INDUSTRIAL AREA (continued)

APPLICATION FOR FEDERAL ASSISTANCE
TASK BUDGET
FY2000 Q1

V995258-01
North Bronson
PRP Oversight (P)

TASK DESCRIPTION

- A.01 Assistance in oversight of on-site activities.
- A.02 Review and comment on reports and documents.
- A.03 Attendance at technical meetings.
- A.07 Review/evaluate/comment on site treatment process.
- A.08 Oversee pre-design activities.
- B.02 Response to inquiries.
- B.04 Review of news releases and legal notices.
- B.06 Prepare/maintain mailing list.
- C.07 Assistance in obtaining site access.
- C.08 ARARs preparation and recommendation of preferred RA alternative.
- D.02 Preparation of progress reports.
- D.03 Preparation of CA and MSCA applications.
- D.04 Management/maintenance of files and Administrative Record.

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CURRENT APPROVED BUDGET	\$25,000
CHANGE REQUESTED	\$25,000
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BUDGET TOTAL	\$50,000

PROGRAM NARRATIVE

NORTH BRONSON INDUSTRIAL AREA, BRANCH COUNTY, MICHIGAN

BACKGROUND:

The response actions at the North Bronson Industrial Area Superfund site are divided into two Operable Units (OU).

The OU1 Record of Decision (ROD) is an interim action that stipulates the actions necessary to address the environmental contamination in the eastern and western sludge lagoons, groundwater impacted by the sludge lagoons, and County Drain #30. The ROD was signed by MDEQ on May 28, 1998 and by the U.S. EPA on June 19, 1998. Subsequent to this signing, the U.S. EPA, with assistance from the MDEQ, successfully negotiated with the PRPs for implementation of the selected remedy and a Consent Decree was signed by the parties on March 15, 1999. The Consent Decree was lodged in U.S. District Court in February 2000.

ACTIONS TO DATE:

Pursuant to the lodging of the Consent Decree, a pre-design work plan was submitted by the PRPs in June 2000. The MDEQ reviewed the document and provided written comments on it to the U.S. EPA. The PRPs have revised the work plan pursuant to the combined comments and this revised document is under review by the agencies.

STATEMENT OF WORK:

Negotiations for conducting a Focused Feasibility Study (FFS) to select the most appropriate response for areas covered in OU2 have just been initiated. Formal notice letters were mailed to the PRPs in September 2000. The MDEQ will provide support activities to the U.S. EPA during negotiations. Expenses associated with these support activities will be covered by an existing pre-enforcement grant.

Once negotiations are complete, and work begins on the FFS, the MDEQ will charge support activities to the existing PRP Oversight grant. The make-up of the OU1 PRP group may differ from the OU2 PRP group. Therefore, although the MDEQ proposes to use the same award for both operable units, we will track oversight activities under separate account numbers for purposes of cost recovery.

The additional funding is requested to continue to cover OU1 support activities through Fiscal Year 2001, and to provide support activities associated with the OU2 FFS and ROD. The MDEQ will use the funds to support the U.S. EPA by conducting reviews of all documents submitted by the PRPs and providing comments on the contents. The MDEQ will attend technical meetings necessary to complete the FFS. In order to complete the FFS, it may be necessary to obtain additional data such as water and soil samples. The MDEQ will provide oversight for field activities as appropriate.

Upon completion of the FFS, the MDEQ will provide assistance in the development of the OU2 ROD, including attendance, as appropriate at public meetings to assist in community relations.

NORTH BRONSON (continued)

STATEMENT OF WORK (continued):

The MDEQ will respond to inquiries and continue to maintain and update the site mailing list. The MDEQ may provide assistance in obtaining site access. Some of the funds will be used for preparation of progress reports, CA or MSCA applications, as well as for management and maintenance of site files, and preparation of state applicable or relevant and appropriate requirements (ARARs).

APPLICATION FOR FEDERAL ASSISTANCE
TASK BUDGET
FY 01 Q1

V995258-01
North Bronson
PRP Oversight (P)

TASK DESCRIPTION

- A.01 Assistance in oversight of on-site activities.
- A.02 Review and comment on reports and documents.
- A.03 Attendance at technical meetings.
- A.07 Review/evaluate/comment on site treatment process.
- A.08 Oversee pre-design activities.
- B.02 Response to inquiries.
- B.04 Review of news releases and legal notices.
- B.06 Prepare/maintain mailing list.
- C.07 Assistance in obtaining site access.
- C.08 ARARs preparation & recommendation of preferred remedial action alternative.
- D.02 Preparation of progress reports.
- D.03 Preparation of CA and MSCA applications.
- D.04 Management/maintenance of files and administrative record.

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CURRENT APPROVED BUDGET	\$25,000
CHANGE REQUESTED	\$30,000
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BUDGET TOTAL	\$55,000